



ASSOCIATION OF NATIONAL ORGANISATIONS  
OF FISHING ENTERPRISES IN THE EU

## EUROPECHE TUNA GROUP priorities for the 24th Special meeting of ICCAT

(11th – 18th November 2024, Limassol, Cyprus)

*Brussels, October 16<sup>th</sup>, 2024*

The International Commission for the conservation of Atlantic Tunas (ICCAT) will hold its 24<sup>th</sup> special meeting in Limassol, Cyprus, from November 11<sup>th</sup> to 18<sup>th</sup>, 2024. Europepeche reminds the importance of this meeting for the sector, especially on the issues of bigeye tuna allocation and FADs measures as well as their impact on the purse seine fleet's economic rentability. Compliance measures are also paramount to fight IUU fishing and ensure a level playing field to the European fleet in the Atlantic Ocean.

### FIGHTING IUU and PROMOTING TRANSPARENCY

#### 1. Improving transparency and data accuracy

- Ensuring compliance with reporting obligations

EUROPÊCHE recommends that CPCs agree on:

- Improving ICCAT's compliance scheme, especially by including a **sanctioning regime and by requiring CPCs to submit action plans that address identified non-compliances**. These plans shall be developed in 2025, and implemented by 2026 the latest, and must:
  - a. Include a hierarchy of infractions.
  - b. Provide a sanctioning mechanism to deal with non-compliance, and that it is consistently applied.
- **Taking action against contracting parties that are repeatedly failing to fulfil their obligations to report on investigations taken in relation to allegations of non-compliance and on actions taken to address compliance concerns.**

- Regarding the FAD moratorium, CPCs having registered vessels under Asian interests<sup>1</sup> have increased their total catches, all fleets included, 68%. In the case of Ghana for example, the number of purse seiners flying their flag is unknown but they increased their total catches 80% between 2016 and 2022, while not increasing proportionally bigeye catches<sup>2</sup>.
- **Increasing observer coverage for all fleets**

Reliable and accurate data collection is paramount to sustainable fisheries management. To achieve this, EUROPÊCHE calls CPC to:

- **Implementing a regional observer program**, integrating existing observer programs, for all fishing vessels, in a realistic timeframe to ensure all CPCs will be able to comply.
- **Increasing observer coverage for all fleets (on-board human and/or electronic)**, considering that purse seiners already apply 100% coverage.
- **Promoting the use of electronic monitoring** to achieve this goal, now that Electronic Monitoring Standards have been adopted ([Rec. 23-18](#)).

ICCAT requires higher observer coverage than the usual 5%<sup>3</sup> on specific cases only: 100% for purse seiners, 20% for bluefin and 10% for tropical tuna vessels for longline. However, these requirements are found in the multi-annual conservation and management plans for tropical tunas ([Rec. 22-01](#)) and bluefin tuna ([Rec. 22-08](#)). [Recommendation 16-14 on minimum observation standards](#) shall be revised to reach those levels for all vessels and fisheries, in order to ensure data reliability.

## 2. Enhancing Control, Monitoring, and Surveillance Measures

- **Improving vessels monitoring**

To ensure effective control, monitoring and surveillance, EUROPÊCHE strongly supports increasing transparency and accountability across all fishing fleets, particularly in the context of fighting against IUU (Illegal, Unreported, and Unregulated) fishing. This includes:

- Establishing a proper **fleet register of all vessels fishing actively in ICCAT, including IMO number for all eligible vessels**. Currently, the exact number of active vessels, especially purse seiners and longliners, is unknown.
- Implementing a **regional Vessel Monitoring System (VMS)**.
- Establishing a **high sea boarding and inspection (HSBI) scheme**.

<sup>1</sup> Ghana, Senegal, Republic of Guinea, Liberia, Belize and Saint Vincent and the Grenadines

<sup>2</sup> From document SCRS/2024/038 « Estimation of Ghana tasks 1 and 2 purse seine and baitboat catch 2019 – 2022: data input 2024 yellowfin stock assessment

<sup>3</sup> [Recommendation 16-14 on minimum observation standards](#)

- Forbidding at sea transshipments.

Only a regional VMS tool would allow to verify vessels' activity and their correct registration in the ICCAT vessels' register, in order to ensure applicability and monitoring of tuna conservation measures, such as fisheries closures or capacity limitations.

High sea inspections are also required to ensure that vessels comply with ICCAT conservation and management measures (CMMs), as required by the [United Nations Agreement relating to the Conservation and Management of Straddling Fish Stocks and Highly Migratory Fish Stocks](#)<sup>4</sup>.

- **Fighting IUU through market directed measures**

EUROPÊCHE encourages CPCs to actively engage in the Catch Document Scheme Working Group and **extend the electronic Catch Documentation Schemes (eCDS) to cover all ICCAT stocks and species** as soon as possible.

This expansion should be aligned with the revised European Control Regulation<sup>5</sup>, which currently limits eCDS to certain fleets and species, and with the introduction of CATCH IT, to prevent the creation of a burdensome system that would disproportionately impact EU fleets.

- **Preventing, deterring, and eliminating marine pollution from fishing activities**

Europêche recommends that ICCAT encourage CPCs to ratify all MARPOL annexes to avoid regulatory duplication and disproportionate measures for fishing fleets.

Europêche emphasizes the importance of strengthening ICCAT's compliance framework while respecting international standards for marine environmental protection.

However, it is essential to incorporate the standards of the international conventions, specifically aimed at preventing pollution from ships at sea, to avoid regulatory redundancies and to ensure that any proposed compliance mechanism aligns with this legal framework.

In this regard, Europêche encourages the ratification of MARPOL annexes instead of creating specific definitions that may not adhere to international standards. Europêche notes that the Canadian proposal presented in document PWG 423 could impose additional constraints on

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<sup>4</sup> In force as from 11 December 2001; Article 21 on Subregional and regional cooperation in enforcement provides that "1. In any high seas area covered by a subregional or regional fisheries management organization or arrangement, a State Party which is a member of such organization or a participant in such arrangement may, through its duly authorized inspectors, board and inspect [...] fishing vessels flying the flag of another State Party to this Agreement" and that "2. States shall establish, through subregional or regional fisheries management organizations or arrangements, procedures for boarding and inspection [...]".

<sup>5</sup> [Regulation \(EU\) 2023/2842 of 22<sup>nd</sup> November 2023 amending the "control regulation"](#): Article 4, points (7) and (8) on Catch certification scheme for fishery products, to modify article 12 of regulation (EC) N°1005/2008

fishing vessels, particularly regarding wastewater and ballast waters, while European vessels operating in the Atlantic already comply with international convention standards.

- **Resolution of legal disputes**

EUROPÊCHE encourages all CPCs to **ratify the dispute resolution mechanism by 2025**.

The ICCAT has already approved a dispute resolution mechanism in the 7th revision of its basic texts<sup>6</sup>. Notwithstanding it requires ratification by two thirds of its CPCs to enter in force.

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<sup>6</sup> <https://www.iccat.int/Documents/Commission/BasicTexts.pdf>

## PANEL 1 on TROPICAL TUNAS

### 1. Achieving sustainable management of Atlantic Ocean tuna stocks

- **Setting TAC and allocation for bigeye and yellowfin tuna**

EUROPÊCHE calls CPCs to cooperate in view of adopting catch limits and allocations for the **effective and fair management of the tropical tuna species** by:

- Setting total allowable catches of **73,000 tons for bigeye tuna**, this number being proposed as a compromise during the last meeting; and of **125,000 tons for yellowfin tuna**, in coherence with the MSY estimated by the SCRS
- **Allocating these TACs among all CPCs** to ensure its effective implementation and that the catch limits are not exceeded.
- Requiring **real-time monitoring** from all CPCs **and fishing management plans** for those developing CPCs that are planning to develop their fisheries.

According to the Standing Committee on Research and Statistics (SCRS), the bigeye tuna TAC could be increased up to 75 000 t corresponding to a probability of 64% of remaining in the green quadrant of the Kobe matrix<sup>7</sup>. In addition, the 2022 SCRS recommendation indicated that a probability higher than 50% is acceptable.

Regarding bigeye allocation, the European tropical tuna purse seine fleet has achieved significant catch reduction efforts for bigeye those last years, which contributed to improve the stock status. Therefore, the bigeye tuna catch increase should benefit to developing countries, which have the right to develop their fleets, but shall at no cost adversely affect the EU fleet, especially when some developed contracting parties do not consume their quota. It is only fair that those vessels who have made major efforts benefit, even to a smaller extent, from the TAC uprise, and that this benefit is not significantly lower than the increase of quota of other industrial fleets.

According to Tropical Tuna Species Group, following the yellowfin tuna stock assessment meeting which took place in Madrid from July 8<sup>th</sup> to 12<sup>th</sup>, the Atlantic yellowfin tuna stock is neither overfished, nor subject to overfishing<sup>8</sup>, with an estimated median MSY of 121,661 t with 80% confidence intervals of 107,485 - 188,456 t<sup>9</sup>. The projections open the possibility to increase the TAC up to 125 000 tons without putting the stock at risk<sup>10</sup>.

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<sup>7</sup> ICCAT's [2023 Report of the Standing Committee on Research and Statistics \(SCRS\)](#), BET-Table 4 c) p. 54

<sup>8</sup> [Report from the 2024 Yellowfin Tuna Stock Assessment Meeting – hybrid, Madrid, 2024](#), Figure 47, p. 69

<sup>9</sup> Idem, Table 12, p. 30

<sup>10</sup> ICCAT's [2024 Report of the Standing Committee on Research and Statistics \(SCRS\)](#)

- **Adopting a multi-species approach for tropical tunas management framework**

EUROPÊCHE calls CPCs to follow a multi-specie approach by establishing a **Management Strategy Evaluation and then develop a comprehensive harvest strategy for the three tropical tuna species (yellowfin, bigeye and skipjack)** that would replace the existing allocation of bigeye.

It is fundamental that the CPCs support the development of the SKJ-W and multi-stock MSE.

Europêche reminds that the SCRS advice indicated in its 2023 report that *“the highest priority [on tropical tunas] is to advance development of the multi-stock MSE and the western skipjack MSE”*<sup>11</sup>. Doing so and promoting a multispecies approach would ensure on the middle term an exhaustive view of the fisheries, including by-catch, and a coherent management.

## **2. Ensuring an operational and fair management of all fleets and gears**

In order to ensure an operational and fair management of all fleets and gears, EUROPÊCHE asks CPCs to restoring level playing field for FAD fisheries, through:

- **Eliminating or reducing the FAD moratorium to one month** considering the improvement of bigeye and yellowfin tuna stocks, the limited evidence of the effectiveness of closures for bigeye of any bigeye fisheries, and the dramatic socio-economic consequences of closures on the tuna purse seine fleet and associated inland industries.
- Establishing measures more proportionate to the objective and context, **targeting specifically those fleets which have drastically increased their catches despite the measures adopted by ICCAT (i.e.. catch limits and FAD moratorium)**, including more stringent control, monitoring and surveillance measures.
- Tasking the **SCRS to provide a dedicated advice on the effects of the existing FAD closure and provide an assessment of its effectiveness.**

According to the SCRS<sup>12</sup>, both skipjack and yellowfin tuna stocks are neither overfished, neither subject to overfishing. The effect of the FAD moratorium for bigeye is not evident. For yellowfin, one-month would be sufficient.

Otherwise, since the implementation of a FAD moratorium in ICCAT in 2016, the European fleet capacity and productivity have been decreasing continuously, jeopardizing its economic sustainability. The number of vessels has dropped by 38% and catches also dropped by 39% for fleets under European interest from 2016 to 2022. The STECF 2023 Annual Economic Report on the EU fishing fleet (p.80) attributes partially this situation to the FAD closure:

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<sup>11</sup> ICCAT's [2023 Report of the Standing Committee on Research and Statistics \(SCRS\)](#) 18.1.9 p. 320

<sup>12</sup> 2024 meeting, report to come

*“The overall reduction of landings reported in ICCAT from both French and Spanish purse seine vessels targeting tropical tuna stocks can be partially explained by the current regulatory framework with a combination of quotas and effort regime system consisting on implementation of a suite of technical measures including decrease of limit of operational buoys to be deployed, 3 months FAD closure, as well as the considerable reduction of catches (20% in relation to the average of the previous 3 years) because of the biological status of bigeye and, in lesser extent, skipjack tuna stocks.*

*In addition, the increase of MCS measures in terms of control of tuna landings at ports, margin of tolerance and monitoring of transshipments has been an extra bureaucratic and operational burden for the activity of this segment.*

*Measures such as the 3 months’ time closure for FADs (Fish Aggregating Devices) might continue having a negative impact in terms of fleet presence of French and Spanish purse seine active vessels in ICCAT RA.”*

Two European companies ceased their activity in 2024. Their disappearance as well as the productivity decrease does not only impact the purse seine ship-owners, but also the canneries they supply in Africa<sup>13</sup>, especially Côte d’Ivoire and Cabo Verde, where Airone and Atunlo<sup>14</sup> announced they would cease their activity in these respective countries. Remaining cannery in Côte d’Ivoire is also encountering significant supply difficulties.

While the FAD moratorium is disproportionately affecting the European purse seine fishery, leading to significant declines in catch and adverse socio-economic effects; in contrast, other fisheries have observed notable increases in their catches. Tuna stocks shall be managed with operational and proportionate measures, including from a socio-economic perspective. For bigeye, there is already a TAC and catch limits in place and considering that *“during 2018-2022, bigeye landings in weight caught by longline fleets represent 47%, purse seine fleets 34%, baitboat 11% and other surface fleets 8% of the total landings”*<sup>15</sup>, any complementary measure shall target also longliners. Focusing only on purse seiners overlooks the potential for juvenile catch in other fisheries, which are less well-documented and lack reliable observation coverage, through high grading, discards, or inaccurate reporting.

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<sup>13</sup> [ATUNA, “Low catches translate into drop in EU canned tuna trade with African Nations”](#)

<sup>14</sup> [La voz de Galicia: “Atunlo pone a la venta su planta en Cabo Verde para hacer frente a la deuda”](#)

<sup>15</sup> ICCAT’s [2023 Report of the Standing Committee on Research and Statistics \(SCRS\)](#), BET-2. Fisheries indicators, p.46

## PANEL 4 on OTHER SPECIES AND BYCTACH

### 1. Running new scientific assessment for Atlantic Shortfin Mako

Europêche:

- calls CPCs to **respect and implement existing reduction measures in Recommendations 22-11 and 21-09**, that establish a catch retention limit to 250 tons, and to discuss any future measures with their stakeholders.
- urges them to ensure that there will be **no more delay at the SCRS level to run new scientific assessments for North and South Atlantic Mako Sharks**.

Current measures from Recommendations 22-11 and 21-09 are being effective as can be seen in the growing abundance of this species observed by the longliners in their daily operations.

The ICCAT workplan to run new scientific assessments for MSE in 2024 both for the North Atlantic and Southern Atlantic stocks was not followed. Again, the ICCAT workplan foresees to run new scientific assessments for MSE in 2025 for both for the North Atlantic and Southern Atlantic stocks. It is paramount to run those.

Europêche reminds that the European fleet is already applying additional measures in order to help the stock recovery: improvement program FIP Blues, on-board observation and improvement of scientific data.

In addition, in 2019, mako sharks were listed in Appendix II of CITES, which requests exporting nations to proof the sustainability of their catches. In the absence of such “proofs”, the Scientific Review Group (SRG) of the European CITES authorities decided in September 2022 to no longer allow imports and exports of shortfin mako from the South Atlantic. Similarly to the SRG of the European CITES, ICCAT’s CPC could decide not to allow the issuing of trade certifications for shortfin mako in the Atlantic.

### 2. Banning setting on cetaceans

EUROPÊCHE recommends that a **ban on intentional setting on cetaceans** is adopted in the ICCAT area of purview.

[Resolution 23-15 on cetacean encirclement](#) encourages CPCs to prohibit their flag vessels from intentionally setting purse seine nets on a school of tunas in the ICCAT Convention area if a cetacean is sighted in or above the tuna school.

Mindful that cetaceans are particularly vulnerable to exploitation including from fishing and concerned about the potential impacts of fishing operations targeting tuna and tuna-like species on the sustainability of cetaceans, EUROPÊCHE considers that this resolution falls short of the required measures needed to minimise and mitigate potential negative impacts on this group of species.



### 3. Implementing whale sharks and mobulids directed measures

Mindful that whale sharks and mobulid rays are particularly vulnerable to exploitation including from fishing, EUROPÊCHE recommends that CPCs **endorse recommendations 23-12 for the conservation of whale shark and 23-14 on mobulid rays caught in association with its fisheries.**

In 2023, ICCAT adopted [Recommendations 23-12 for the conservation of whale sharks](#) caught in association with its fisheries and [Recommendation 23-14 on mobulid rays \(family Mobulidae\) caught in association with its fisheries](#), in line with measures adopted by other tuna RFMOs<sup>16</sup>.

However, both recommendations will enter into force only if there is a consensus on the interpretation of the SCRS advice at the 2024 Annual Meeting.

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<sup>16</sup> For whale sharks: IOTC Resolution 13/05, WCPFC CMM 2022-04, IATTC Resolution C-19-06 and for mobulid rays: IOTC Resolution 19/03), WCPFC CMM 2019-05, IATTC Resolution C-15-04